

EXHIBIT C

Declaration of Wilbur E. Johnson

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

EARL GAVIN,)	
)	
Plaintiff,)	
)	
v.)	Case No. 7:18-cv-00523-AMQ-JDA
)	
EXPERIAN INFORMATION SOLUTIONS,)	
INC.; TRANS UNION LLC; and)	
EQUIFAX, INC.,)	
)	
Defendants.)	

**DECLARATION OF WILBUR E. JOHNSON IN SUPPORT OF
DEFENDANT TRANS UNION LLC’S MOTION TO COMPEL
DISCOVERY RESPONSES AND MEMORANDUM IN SUPPORT**

I, Wilbur E. Johnson, counsel for Defendant Trans Union LLC (“Trans Union”), hereby declare:

1. My name is Wilbur E. Johnson. I am over 21 years of age and I am competent to testify as to the matters stated herein. I have authority to submit this Declaration on Trans Union’s behalf in support of Defendant Trans Union LLC’s Motion to Compel Discovery Responses and Memorandum in Support (“Defendant’s Motion”).

2. I have personal knowledge of the facts herein stated based upon my experience with this litigation.

3. On June 28, 2018, I was copied on Trans Union’s correspondence to Plaintiff sending Trans Union’s First Set of Interrogatories, First Requests for Production, and First Requests for Admission (“Discovery Requests”) to Plaintiff. A true and correct copy is attached to Trans Union LLC’s Motion to Compel Discovery Responses and Memorandum in Support as **Exhibit A.**

4. Plaintiff served his responses to Trans Union's discovery requests on July 4, 2018. A true and correct copy of Plaintiff's responses to Trans Union's discovery requests is attached to Trans Union LLC's Motion to Compel Discovery Responses and Memorandum in Support as **Exhibit B**.

5. Pursuant to 28 U.S.C. §1746, I further declare under penalty of perjury that the foregoing is true and correct.

Executed this 25th day of July, 2018, at Charleston, South Carolina.

s/ Wilbur E. Johnson

WILBUR E. JOHNSON